COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF OWEN ELECTRIC COOPERATIVE)
CORPORATION FOR REVISIONS TO ITS METER)
READING TARIFF TO ACCOMMODATE MANUAL METER) CASE NO.
READING CHARGES IN INSTANCES WHERE ITS	2012-00468
ADVANCED METERING INFRASTRUCTURE IS)
PROHIBITED FROM BEING UTILIZED FOR ITS)
INTENDED PURPOSE)

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. ("Owen") pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Owen shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Owen fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

- 1. Refer to Owen's response to Item 1.a. of Commission Staff's Initial Request for Information ("Staff's Initial Request"), which states that six customers do not wish to be metered using advanced metering infrastructure ("AMI"). State whether the customers have been notified of Owen's proposal to charge a meter reading fee of \$30 if they do not accept an AMI meter.
- 2. Refer to Owen's response to Item 1.b. of Staff's Initial Request, which states that there are currently approximately 600 residential meters equipped with AMI, but that Owen is unable to read these meters due to communication problems. State whether Owen intends to apply the meter reading fee to these customers.
 - 3. Refer to Owen's response to Item 3 of Staff's Initial Request.
- a. Did Owen intend to state that the meter reading expense included in base rates is \$226,481 instead of \$225,481?
- b. Explain in detail why Owen incurred that level of meter reading expense when virtually all of its meters were AMI meters during the test year and were

read remotely. Include in your response details of the costs incurred for meter reading expense during the test year ending December 31, 2009.

Jeff Derollen

Executive Director

Kentucky Public Service Commission

P.O. Box 615

Frankfort, Kentucky 40601

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DATED					

CC:

Parties of Record

Honorable James M Crawford Attorney At Law Crawford & Baxter, P.S.C. Attorneys at Law 523 Highland Avenue P. O. Box 353 Carrollton, KENTUCKY 41008